

## **EXHIBIT G**

Farber - 30(b) (6) & Individual, Kenneth, Gary (CONFIDENTIAL) 12/16/2009

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

ePLUS, INC., )  
Plaintiff, )  
v. ) No. 3:09cv620  
LAWSON SOFTWARE, INC., )  
Defendant. )

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

Washington, D.C.

Wednesday, December 16, 2009

30(b) (6) Videotape Deposition of ePLUS, INC., by and through its designee, KENNETH GARY FARBER, and in his individual capacity, called for examination by counsel for Defendant in the above-entitled matter, the witness being duly sworn by CHERYL A. LORD, a Notary Public in and for the District of Columbia, taken at the offices of TROUTMAN SANDERS LLP, 401 9th Street, Suite 1000, Washington, D.C., at 12:09 p.m., and the proceedings being taken down by Stenotype by CHERYL A. LORD, RPR, CRR.

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<p style="text-align: right;">Page 14</p> <p>1 Q. Do you have some people dedicated just to 2 content and catalog management? 3 A. Yes. 4 Q. And did I understand right that content 5 and catalog management, that's one of the 5 6 categories? 7 A. One of the 5 categories. 8 Q. Do you have some employees dedicated to 9 asset management? 10 A. Yes. 11 Q. Do you have some employees dedicated to 12 spend analytics? 13 A. Yes. 14 Q. How long has your division operated within 15 that 5-category structure? 16 A. Well, it -- it varies by -- by product line. 18 Q. I'm just talking about that structure of 19 5. I mean, if you have 4 or 6, then you don't have 5 20 anymore, so I just want to stick -- how long have you 21 had these 5 categories? 22 A. All 5 categories? 23 Again, it varies by -- by application, so 24 that we're 5 categories for -- you know, analytics as 25 an example was offered I think within the last 2</p>	<p style="text-align: right;">Page 16</p> <p>1 other than spend analytics? 2 A. That's been in place since I joined ePlus. 3 Q. Was that 9 years ago? 4 A. Yes. 5 Q. Okay. So 2000, is that when you started? 6 A. It was actually 2001. We're coming up on 7 9 years. 8 Q. So since 2001 up until the time spend 9 analytics was added, the 4 product categories in your 10 division were e-procurement, 1, content and catalog 11 management, 2, asset management, 3, and document 12 management systems, 4; is that right? 13 A. Correct. 14 Q. Does your division at ePlus use those 4 15 categories for purposes of sales and marketing? 16 A. Yes. 17 Q. Within the 5 categories that you've 18 listed, do you consider Lawson Software to be a 19 competitor in any of those? 20 A. Yes. 21 Q. Which one or ones of the 5 do you consider 22 them to compete with ePlus in? 23 A. What I have knowledge about would be procurement and catalog and content management. 25 Q. Does Lawson compete with ePlus in asset</p>
<p style="text-align: right;">Page 15</p> <p>1 years. 2 Q. Okay. So have you had 5 categories for 3 about 2 years now? 4 A. If you want to consider all 5 of those 5 categories together, yes. 6 Q. Well, whether they're together or not, I 7 mean, have you had a structure within your division 8 at ePlus that has had these 5 categories that you 9 listed for about 2 years now? 10 A. Yeah. 11 I think I answered the question. 12 Q. Okay. Well, prior to the time you had 13 these 5 categories, how many categories did you have 14 immediately prior? 15 A. 4. 16 Q. Did you have all of the ones you listed 17 except for spend analytics? 18 A. Yes. 19 Q. Was spend analytics added in about 2007? 20 A. Yeah, latter part of 2006, early 2007, I believe that's correct. 22 Q. All right. So maybe closer to about 3 years, then, that you got the 5? 24 A. Perhaps. I'd have to check, but -- 25 Q. How long did you have the 4 categories</p>	<p style="text-align: right;">Page 17</p> <p>1 management? 2 A. I don't know. I haven't -- I don't have 3 familiarity of Lawson in that category. 4 Q. Does Lawson compete with ePlus in spend 5 analytics? 6 A. Again, they may, but none that I've been 7 aware of in a competitive situation. 8 Q. Does Lawson compete with ePlus in document 9 management systems? 10 A. Same answer. 11 Q. Who would you consider to be your top 4 12 competitors in the procurement area today? 13 A. Well, that really depends how -- how one 14 would quantify a top competitor. It really does 15 vary. 16 Certainly, you know, I categorize them in 17 certain buckets. 18 Q. Buckets according to how significant a 19 competitor they are? 20 A. Yeah, and how -- you know, there's waves in terms of how companies concentrate on their -- on 22 their portfolio and how many -- how much marketing 23 they're doing in a specific area, how many 24 salespeople they may have, how often we're seeing 25 them in a particular area.</p>

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